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DOLLAR TREE STORES, INC.

13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16

17 KASSONDRA BAAS and KELLY LOFQUIST,
individually and on behalf of all others
18 similarly situated,

19 Plaintiffs,

20 v.

21 DOLLAR TREE STORES, INC.,

22 Defendant.
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CASE NO. C 07-03108 JSW

DECLARATION OF JOE ESTRADA

1 I, Joe Estrada, hereby declare as follows:

2 1. I am a certified interpreter, certification no. 01424780. I am fluent in
3 both English and Spanish. I provide this declaration in order to explain the translating
4 services that I have provided at the request of Dollar Tree Stores, Inc.'s ("Dollar Tree")
5 attorney, Rossana S. Eltanal. I have personal knowledge of the facts stated in this
6 declaration and would testify thereto if called as a witness in the above-captioned matter.

7 2. On December 27, 2007, Ms. Eltanal and I met with Jose Baeza at
8 the Dollar Tree store located in Rohnert Park. Mr. Baeza is fluent in Spanish. I served
9 as an interpreter for the interview between Ms. Eltanal and Mr. Baeza. During the
10 meeting, I was able to communicate clearly and effectively with Mr. Baeza. Moreover,
11 Mr. Baeza stated that he was willing to sign a declaration setting forth certain facts
12 regarding his employment at Dollar Tree.

13 3. On January 9, 2008, with the assistance of another interpreter in my
14 office, I prepared a written, Spanish translation of the declaration of Mr. Baeza drafted by
15 Ms. Eltanal in English. A true and correct copy of the declaration of Jose Baeza in
16 English is attached hereto as **Exhibit A**. A true and correct copy of the declaration of
17 Jose Baeza translated correctly into Spanish is attached hereto as **Exhibit B**.

18 4. On January 15, 2008, I met again with Mr. Baeza and Ms. Eltanal at
19 the Dollar Tree store in Rohnert Park. A copy of the declaration in Spanish was provided
20 to Mr. Baeza for his review. I also read to him, verbatim in Spanish, the declaration. Mr.
21 Baeza then voluntarily signed both declarations. See Exhibits A and B.

22 I have read this declaration, and do hereby declare, under penalty of
23 perjury under the laws of the United States of America that it is true and correct.

24 Executed this 11 day of March 2008 in San Jose, California.

25
26 
27 JOE ESTRADA

28 4846-1764-4290.1

EXHIBIT A

1 MAUREEN E. McCLAIN (State Bar No. 062050)
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13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16

17 KASSONDRA BAAS and KELLY
LOFQUIST, individually and on behalf of all
18 others similarly situated,

19 Plaintiffs,

20 v.

21 DOLLAR TREE STORES, INC.,

22 Defendant.
23

CASE NO. C 07-03108 JSW

**DECLARATION OF JOSE
BAEZA**

ENGLISH VERSION

24 This document has been translated into Spanish by JOE ESTRADA,
25 C.C.I., Certification No. 01424780.
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1 I, Jose Baeza, do hereby declare:

2 1. All the facts contained in this Declaration are based on my own
3 personal knowledge and, if called as a witness, I could competently testify to them.

4 2. I am providing this Declaration voluntarily. Dollar Tree Stores, Inc.
5 ("Dollar Tree") has informed me that providing or not providing this Declaration will not
6 affect my employment with Dollar Tree.

7 3. I am currently employed as an Assistant Manager by Dollar Tree at
8 store number 1868 in Rohnert Park, California. I was hired as a stocker approximately 6
9 years ago.

10 4. I have never worked off the clock at Dollar Tree. No Store Manager
11 has asked me to work off the clock. No Store Manager has asked me to continue
12 working without pay after my shift ended. I do not know of any other employee who has
13 worked off the clock.

14 5. Dollar Tree has compensated me for all overtime hours I have
15 worked. I have not worked any overtime at Dollar Tree in the last 2 to 3 years.

16 6. I have not had any pay issues with Dollar Tree or any Store
17 Manager. I have not had any problems receiving payment on time for the hours I
18 worked. I have not heard of other employees having pay issues at Dollar Tree.

19 7. I remember another Dollar Tree employee named Kassondra Baas
20 who worked at the Rohnert Park store. However, I did not know anything about her. I
21 recall that we worked during different shifts.

22 8. I do not recall working with a Dollar Tree employee named Kelly
23 Lofquist.

24 I have read the above Declaration and do hereby declare under penalty of
25 perjury under the laws of the United States of America that it is true and correct.

26 Executed this 15 day of January, 2008 in Rohnert Park, California.

27
28



JOSE BAEZA

EXHIBIT B

1 MAUREEN E. McCLAIN (State Bar No. 062050)
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6 Abogados del Demandado
DOLLAR TREE STORES, INC.

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11 Fax: (757) 629-0660

12 *Pro Hac Vice* Abogados del Demandado
DOLLAR TREE STORES, INC.

14 CORTE DEL DISTRITO DE LOS ESTADOS UNIDOS
15 DISTRITO DEL NORTE DE CALIFORNIA

17 KASSONDRA BAAS y KELLY LOFQUIST,
18 individualmente y a nombre de otros en
situación similar,

19 Demandante,

21 v.

22 DOLLAR TREE STORES, INC.,

23 Demandado.

CASO NO. C 07-03108 JSW

**DECLARACION DE JOSE
BAEZA**

VERSION EN ESPAÑOL

25 Este documento ha sido traducido al español por JOE ESTRADA, C.C.I.,
26 Número de Certificación. 01424780.

1 Yo, Jose Baeza, mediante la presente declaro:

2 1. Todos los hechos contenidos en esta Declaración estan basados en
3 mi conocimiento personal, y si me requieren como testigo, yo puedo testificar
4 competentemente.

5 2. Estoy proporcionando esta Declaración voluntariamente. Dollar
6 Tree Stores, Inc. ("Dollar Tree") me ha informado que proporcionando o no
7 proporcionando esta Declaración no afectara mi empleo en Dollar Tree.

8 3. Actualmente estoy empleado en Dollar Tree como Asistente de
9 Gerente en la tienda número 1868 en Rohnert Park, California. Fuí contratado como
10 almacenador hace aproximadamente 6 años.

11 4. Nunca he trabajado más de lo que marcaba el reloj en Dollar Tree.
12 Ningún Gerente de Tienda me ha pedido que trabaje más de lo que marca el reloj.
13 Ningún Gerente de Tienda me ha pedido que continúe trabajando sin pagarme después
14 de que mi jornada de trabajo ha terminado. No se de ningún otro empleado que haya
15 trabajado fuera de su jornada.

16 5. Dollar Tree me ha compensado por todas las horas de tiempo extra
17 que he trabajado. No he trabajado tiempo extra en los últimos 2 o 3 años.

18 6. No he tenido ningún problema de pago con Dollar Tree o con un
19 Gerente de Tienda. No he tenido ningún problema para recibir mi pago a tiempo por las
20 horas que he trabajado. No he escuchado que algún otro empleado tenga problemas
21 con sus pagos en Dollar Tree.

22 7. Recuerdo a otro empleado de Dollar Tree llamada Kassondra Baas
23 que trabajo en la tienda de Rohnert Park. Sin embargo, no se nada acerca de ella.
24 Recuerdo que trabajamos diferentes jornadas.

25 8. No recuerdo trabajar en Dollar Tree con una empleada llamada
26 Kelly Lofquist.

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1 He leído esta Declaración y mediante la presente declaro bajo
2 penalización por falso testimonio bajo las leyes de los Estados Unidos de America que
3 esto es correcto y verdadero.

4 Ejecutado este 15 día de Enero del 2008 en Rohnert Park, California.

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JOSE BAEZA

8 4813-3205-2738.1
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